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April 1, 2020

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VIA CM/ECF

Hon. Lawrence E. Kahn, Senior U.S. District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 424
Albany, NY 12207-2926

Re: *Jennings v. Decker, et al*
Civil Action No.: 5:17-cv-54 (LEK/TWD)

Dear Judge Kahn:

I am writing to request that the current deadline to file dispositive motions be extended 90 days to **July 27, 2020** in light of the coronavirus pandemic. Please note that my request for an additional 90 days to file a dispositive motion is consistent with the most recent Order of Justice Murphy, Chief Administrative Judge for the Fifth Judicial District of the State of New York. Section (B)(8) of Justice Murphy's Second Amended Administrative Order (No. 5AOA02020-49) extends deadlines for a period of 90 days from the date of the stated deadline established per judicial directive. A copy of the aforementioned Administrative Order is attached as Exhibit "A".

Given that City Hall is closed, I am currently working from home pursuant to Mayor Walsh's directive. As such, while I do have remote access capability, it is intermittent and typically slow. Our IT department is working diligently to fix issues but it does not seem to be resolved.

Further, my ability to communicate with my clients during this time has proven difficult. Being that police officers are "essential personnel" and are operating on a guarded footing, they are functionally unavailable to me under this State of Emergency. They may also at any time be shifted to a more emergent footing based on the evolving needs of public safety and welfare. Illustrative of this, SPD has greatly restricted its contact with the community as instructed by protocols from the CDC.

On a personal note, I am juggling work with the care of my 5-year-old twins, whose school has been closed thru at least April 20, 2020, likely longer, due to the pandemic. My husband works in healthcare so I am handling the bulk of child care duties myself, making it difficult for me to devote any appreciable amount of time to drafting Defendants' motion.

I consulted with Mr. Cannizzaro prior to making this request, and he not only consented but expressed similar sentiments about the logistical difficulties of working from home

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during this time. His courtesy and professionalism is very much appreciated. I hope Your Honor, court personnel, and Mr. Cannizzaro stay safe and healthy during this very strange and uncertain time.

Respectfully Submitted,

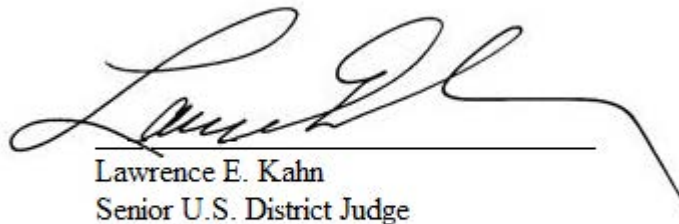
s/Christina F. DeJoseph

Christina F. DeJoseph, Esq.
Senior Assistant Corporation Counsel

Encls.

CC: *All Counsel of Record Electronically via CM/ECF*

IT IS SO ORDERED:



Lawrence E. Kahn
Senior U.S. District Judge

Dated: April 1, 2020